



August 6, 2013

Ms. Michelle Farley  
Air Engineer  
Department of Natural Resources  
2984 Shawano Avenue  
Green Bay, Wisconsin 54313-6727

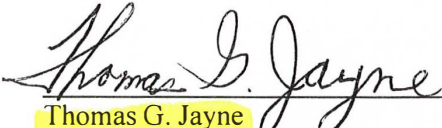
**RE: 1st Half 2013 Title V Permit Summary Monitoring Report**  
**Reporting Period: January 1- June 30, 2013**

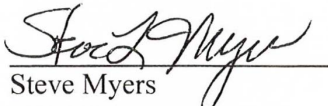
Dear Michelle:

This report is a summary of the compliance status of the monitoring requirements in the Title V Operation Permit 445031180-P12 for the reporting period January 1-June 30, 2013. The permit page numbers and permit references refer to the current permit in effect. Any deviations from permit conditions or excess emissions during this reporting period are summarized in **Appendix A** attached.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,

  
Thomas G. Jayne  
Manager, Environmental Services

  
Steve Myers  
Mill Manager

1st Half 2013 Title V Permit Summary Monitoring Report  
Thilmany, LLC Kaukauna, WI

Permit No. 445031180-P12  
Reporting Period: January 1, 2013 - June 30, 2013

Permit Reference	Compliance (In or Out)	Monitoring Range if applicable
<b>page 9</b>		
A.1.b.(3)	In	monitored in PI; all scrubber flow and dif P averages above minimums except except when boiler is idling and firing natural gas only
<b>page 10</b>		
A.1.c.(5)	In	monitored in PI
A.3.a.(2)	In	No. 6 fuel oil ranged from 1.23 - 1.451 % S
<b>page 11</b>		
A.3.b.(1)	In	SO2 emissions ranged from 0- 4 pounds/hr;24 hr ave
<b>page 12</b>		
A.5.c.(1)	In	No alternative fuels used in the boiler during the reporting period
<b>page 13</b>		
B.1.b.(3)	In	recorded on Power Boiler Emission Control Checklist
B.1.c.(2)	In	recorded on General Utilities Fuel Distribution Report
B.1.c.(4)	In	recorded on Power Boiler Emission Control Checklist
<b>page 15</b>		
B.2.a	Intermittent	daily COMS reports on file, see Appendix A
B.1.c.(9)	In	monitored in PI
B.2.c.(2)	In	submitted 1st and 2nd Q 2013 EE Reports
<b>page 16</b>		
B.3.c.(2)	In	SO2 emissions range from 3.56-5.06 lbs SO2/MMBTU;24 hour ave
B.3.c.(3)	In	and 837-2375 lbs SO2/hr; 24 hr ave.
B.3.a.(3)	In	No. 6 fuel oil ranged from 1.23 - 1.451 % S
<b>page 17</b>		
B.5.c.(2)	In	SO2 emissions ranged from 4375-4799 lbs./month;12 mo rolling ave.
B.5.c.(3)	In	
B.5.c.(4)	In	
<b>page 18</b>		
B.6.c.(1)	In	% heat input from TDF ranged from 0%-6.78% on heat input basis
B.6.c.(2)	In	recorded on General Utilities Fuel Distribution Report
<b>page 19</b>		
C.1.c.(2)	In	Package Boiler was not used during the reporting period.
<b>page 20</b>		
D.1.b.(4)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(2)	In	Recorded on General Utilities Fuel Distribution Report
<b>page 21</b>		
D.2.a	Intermittent	COMS daily reports; see Appendix A
D.1.c.(3)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(5)	In	on file, ESP performance and rapper programs reviews; no changes made to programs
D.1.c.(6)	In	Recorded on #19 Air Emission Data Sheet
D.1.c.(8)	In	Recorded on #19 Air Emission Data Sheet
<b>page 22</b>		
D.2.c.(2)	In	submitted 1st and 2nd Q 2013 EE Reports
D.3.b.(2)	In	SO2 emissions ranged from 12.6- 209.3 lbs SO2/hr; 24 hr ave.
D.3.a.(2)	In	No. 6 fuel oil ranged from 1.23 - 1.451 % S
<b>page 24</b>		
E.1.c.(2)	In	Recorded on the MACT II CMS summary sheet
<b>page 25</b>		
E.3.c.(1)	In	Recorded on MACT II CMS summary sheet
<b>page 26</b>		
E.4.b.(1)	In	Recorded on MACT II CMS summary sheet
E.4.b.(2)	In	Recorded on MACT II CMS summary sheet
E.4.b.(3)	In	Recorded on MACT II CMS summary sheet
<b>page 27</b>		
F.1.c.(2)	In	Recorded on Lime Kiln Report #22
<b>page 28</b>		
F.3.a.(2)	In	No. 6 fuel oil ranged from 1.23 - 1.451 % S
F.3.b.(1)	In	SO2 emissions ranged from 51-1.72 lbs SO2/hr;24 hr ave basis
<b>page 29</b>		
F.4.c.(2)	In	NOx emission rate ranged from 6.04- 8.88 lbs /hr;24 hr ave
<b>page 30</b>		
F.6.b.(1)	Intermittent	see Appendix A
F.6.c.(2)	In	TRS and O2 CEMS reports on file
F.6.c.(3)	In	TRS ppmv 12 hr block averages ranged from 0.11- 1.93 ppmv corrected to 10% O2

Permit Reference	Compliance (In or Out)	Monitoring Range if applicable
page 31 F.6.c.(6)	In	1st and 2nd Q 2013 EE reports submitted
page 31 F.7.b.(2)	In	Recorded on MACT II CMS summary sheet
page 31 F.7.b.(3)	In	Recorded on MACT II CMS summary sheet
page 33 G.1.c.(2)	In	Recorded on Lime Kiln TRS Log
page 34 H.4.c.(2)	In	Recorded on monthly NCG LVHC walkdown checklists Annual Method 21 reports on file
page 35 H.4.c.(3)	In	Recorded on monthly condensate walkdown checklists
page 36 H.4.b.(7)	In	new MeOH average calculated and updated annually in Proficy -current value is 2884 ppm
page 36 H.4.b.(8)	In	
page 37 H.4.b.(9)	In	calculated in Proficy
page 38 H.4.b.(11)	In	calculated in MACT reporting system; submitted with EE reports
page 39 H.5.c.(2)	In	submitted with 1st and 2nd Q 2013 EE Reports
page 42 K.1.c.(2)(b)	In	Paper Machine PM emission rates ranged from .35-.76 lbs./hr; monthly ave basis
page 43 K.3.c.(3)	In	Paper Machine size press VOC emissions : P11- 341-651 lbs/mo P13- 0-666 lbs./mo P14- 328-930 lbs./mo P15- 3-318 lbs./mo
page 44 L.1.c.(2)	NA	P52 Extruder was removed.
page 44 L.2.c.(2)(d)	NA	P33 REMOVED on 3/17/12 P33 REMOVED on 3/17/12
page 46 L.3.c.(3)	NA	P33 wax coater and P52 poly extruder have been removed P33 wax coater and P52 poly extruder have been removed
page 46 L.3.c.(4)	NA	
page 47 M.1.c.(2)	NA	All poly extruders have been removed
page 48 M.3.a.(3)	NA	P72 REMOVED
page 48 M.3.a.(5)	NA	All poly extruders have been REMOVED
page 48 M.3.a.(6)	NA	All poly extruders have been REMOVED
page 49 M.4.c.(2)	NA	All flexo presses have been REMOVED
page 50 M.5.c.(2)	NA	P72 has been REMOVED
page 51 N.1.c.(1)	In	Log on file in Proficy
page 56 O.5.b.(1)	In	No. 6 fuel oil ranged from 1.23 - 1.451 % S facility SO2 emissions ranges from 7322- 8127 tons SO2; 12 mo rolling ave basis
page 56 O.6.b.(1)	In	
page 61 O.8.b.(4)	In	records on file
page 63 O.8.b.(7)	In	1st and 2nd Q 2013 EE reports were submitted MACT semiannual EE and CMS Performance report submitted
page 63 O.8.b.(8)	In	
page 64 O.9.a.and b	In	PM emission compliance stack test on No. 11 Boiler only was completed on 12/2/09. The average emission rate as .04 lbs PM/MMBTU
page 65 O.10.b.(1)	In	annual emission of selected HAPS are reported on the 2012 Air Emission Inventory

## **Appendix A**

### **Permit Deviations and Excess Emissions for the Reporting Period January 1, 2013- June 30, 2013**

#### **Permit Reference**

Page 15 B.2.a.

Page 21 D.2.a.

Page 30 F.6.b.(1)

#### **Deviation or Excess Emission**

There were 12 minutes of excess opacity from S09 previously reported in the 1<sup>st</sup> Q 2013 Excess Emissions Report

There was one 6 minute period of excess opacity from S08 and 48 minutes of excess opacity S10. These incidents were previous reported in the 2<sup>nd</sup> Q 2013 Excess Emissions Report.

As previously reported on the quarterly EE reports, the LVHC NCG collection and incineration system experienced the following vent time for the reporting period:  
9.43 minutes including SSM events or 0.004 % of the operating time. There were a total of 167 vents.